

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

FARRIE R. EASTER-GREENE, *et ux.*

Plaintiffs

v.

VERIZON MARYLAND LLC, *et al.*

Defendants

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Civil Action No.: 1:14-cv-01040-MJG

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DEFENDANT VERIZON'S ADOPTION OF CODEFENDANTS'
RESPONSE TO PLAINTIFFS' MOTIONS TO REMAND

Defendant Verizon Maryland LLC ("Verizon") notes its adoption of Harbor Group's Response in Opposition to Motion for Order of Remand, in response to the plaintiffs' various series of filings regarding removal and remand.

Verizon also notes that it filed its Answer to the Complaint in this court, in federal format, on April 8, 2014. (Verizon had not filed an answer in state court.) The timing of Verizon's Answer complied with FRCP 81(c)(2)(C) (within seven days after notice of removal was filed). (This was also effectively within a thirty day period after service, as service was made by certified mail received by Verizon's resident agent on March 6, 2014. *See* FRCP 6(d), adding three days after service by mailing.) Verizon also filed a timely Standing Order statement, confirming its consent and joinder in removal.

Prior to the filing of Harbor Group's notice of removal on April 3, 2014, the undersigned Verizon counsel had authorized Harbor Group's counsel to indicate Verizon's consent and joinder in the removal.

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Note: This filing was delayed one day due to building flooding and resultant server outage beginning on May 12, 2014, with the server outage continuing until approximately 8:45 a.m. May 13, 2014.